

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROBERT STROUGO, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LANNETT COMPANY, INC., TIMOTHY C.
CREW, and MARTIN P. GALVAN,

Defendants.

Case No. 2:18-cv-03635-MAK

Judge Mark A. Kearney

**DECLARATION OF LUIGGY SEGURA REGARDING NOTICE AND CLAIMS
ADMINISTRATION**

I, LUIGGY SEGURA, declare as follows:

1. I am an Assistant Director with JND Legal Administration (“JND”), whose Corporate Office is located in Seattle, Washington. I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. JND has been retained by Defendants and Defendants’ Counsel to act as the Claims Administrator in connection with the proposed Settlement of the above captioned action (the “Action”).

3. The principals of JND collectively have over 75 years of experience in class action legal and administrative fields. They have personally overseen some of the largest legal securities matters in the country’s history including, among many others, Worldcom (\$6.15 billion settlement), IPO (\$586 million settlement), Tyco (\$3.2 billion settlement), Bank of America (\$2.4 billion settlement), Royal Ahold (\$1.1 billion settlement), and Nortel Networks (\$2.2 billion settlement). Our firm profile is attached as Exhibit A.

4. As in most class actions of this nature, to effectuate notice to the class, JND will mail a copy of the notice and claim form to the shareholders of record identified by the parties and to JND's database of approximately 4,000 banks, brokers, and other nominees. These banks and brokers are instructed to either forward the notice and claim form to potential class members or to provide the names and addresses of potential class members to JND so that we may forward the notice and claim form directly.

5. JND will also cause a summary notice to be published in a national business newswire disseminated electronically as a press release.

6. Class Members who wish to be eligible to receive a distribution from the Net Settlement Fund are required to complete and submit to JND a properly executed claim form either by mail or online such that it is postmarked or received no later than the claim-filing deadline established by the Court, together with adequate supporting documentation for the transactions and holdings reported therein.

7. Each submitted claim form is reviewed upon receipt to verify that all required information had been provided. The documentation provided with each claim form is also reviewed for authenticity and compared to the information provided on the claim form to verify the claimant's identity and the purchase/acquisition transactions, sale transactions, and holdings listed on the claim form.

8. If a claim form is determined to be defective, a deficiency letter will be sent to the claimant describing the defect including, where applicable, what is necessary to cure the defect. The letter will advise the claimant that the submission of the appropriate information and/or documentary evidence to complete the claim form has to be sent within a specified time period from the date of the letter, or the claim form would be recommended for rejection to the extent

that the deficiency or condition of ineligibility was not cured. The letter will also advise claimants that if they desired to contest the administrative determination, they are required to submit a written statement to JND requesting Court review of their claim form and setting forth the basis for their request.

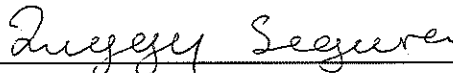
9. After the claims have been reviewed and final determination have been made as to which claims are valid, JND will calculate each claim's Recognized Loss pursuant to the Court-approved Plan of Allocation and pro rata distribution amount based on the total Recognized Losses of all claims and the amount available for distribution in the Net Settlement Fund. Based on our experience, we expect the total Recognized Losses for all claims to exceed the amount available in the Net Settlement Fund for distribution such that the fund will be fully exhausted and allocated to eligible claimants.

10. Distribution payments will be sent via checks and wires with a specified period for each claimant to cash their payment (typically 90 or 180 days). For any checks that are not cashed, JND will conduct an outreach campaign to encourage cashing and providing claimants with reissued checks where applicable.

11. The process described herein is the standard notice and claims administration process for securities class action settlements.

I declare under penalty of perjury, under the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of July.



LUIGGY SEGURA

EXHIBIT A



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Who We Are

With over 70 years of collective experience in law and administration, it's no surprise that JND's seasoned executive management team has built the fastest-growing legal administration firm in the industry. When you work with us, your case receives the personal attention and expertise of our principals –Jen Keough (J), Neil Zola (N), and David Isaac (D).

JND is well-known throughout the legal industry for providing the most responsive, trustworthy, and comprehensive legal administrative service in the country. JND has already been recognized by the New York Law Journal and the Legal Times as the best administration firm in the country for 2018 and 2017. JND was also recently named an approved vendor for the United States Securities and Exchange Commission (SEC) and the Federal Trade Commission (FTC).

Where other firms come up short, clients who want the most dedicated, technically agile team turn to JND for innovative, ambitious strategies with proven results.



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JND and its principals have overseen some of the most complex class action and mass tort cases in our country's history.

No other company in the legal industry understands more about client delivery. No one else has proven their ability to handle large, intricate cases like JND. And no other company excels at the range of services JND offers.

☑ **CLASS ACTION ADMINISTRATION**

Comprehensive administrative resources through pre-settlement consultation, complete notice services, claims processing and validation, scalable call center capabilities, state-of-the-art website design, and an array of distribution services.

☑ **MASS TORT & LIEN RESOLUTION**

Manage client intake, screening, and retention; medical record retrieval and review; Plaintiff Fact Sheet preparation including a unique online website offering; claims and settlement administration; lien resolution; and disbursements.

☑ **eDISCOVERY**

Leverage an extensive, flexible cloud-based platform to provide targeted data analysis, logical, physical and mobile forensics, data recovery, email examination, and timeline generation among many other offerings.

☑ **GOVERNMENT SERVICES**

Assistance with all facets of any administration, including systematic noticing, claims processing and validation, contact services, state-of-the-art website design and distribution, and account reconciliation.



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Class Action



JND delivers the most reliable and comprehensive legal administrative resources and services available to our clients. Our team has handled some of the most complex class action settlements in the country's history.

PRE-SETTLEMENT CONSULTING

We begin by consulting with clients on how to develop allocation methodologies and design efficient, economical roadmaps for settlement administration while providing preliminary hearing support. Our team works with the parties to compile the class list, or maintain a role as independent auditor of an existing class list to verify completeness.

NOTICE PROGRAM

Effectively notifying class members is key to the approval of your settlement. We advise our clients on effective notice best practices and are experienced in preparing class lists from various sources. Management of the entire CAFA Notice process for Defendants is handled by our team with our proprietary database of officials who need to be notified. Our notice and claim form mailing services utilize creative options to maximize effectiveness and reduce costs, while our advertising team comprises experts handling all media publication needs while obtaining the best rates.

CLAIMS PROCESSING

Our professional staff is trained to process even the most complex claims with efficiency and accuracy and we are readily available to draft, or assist in drafting, claim forms to ensure class comprehension and complete claim form submission. Proprietary databases efficiently capture claim form data as well as accurate and flexible reporting; and with our proprietary online claim submission site, we can provide secure submission and reduce overall complexity. Knowing each case is different, we offer customized reporting to provide a variety of perspectives on the data that our clients may have not considered.

BENEFIT DISBURSEMENT

JND manages all aspects of the settlement fund, including opening disbursement accounts, reconciling accounts, establishing a Qualified Settlement Fund (QSF), filing tax returns, and serving as Escrow Agent. Even the most complex benefit allocation methodology is implemented and applied to individual class members. In addition, we manage tax reporting for settlement disbursements, including the issuance of tax statements, such as W-2s and 1099s, to class members. We also calculate the payroll withholding and employer taxes that are often required in employment class action settlements. Our team partners with a respected CPA firm to prepare settlement fund tax returns.



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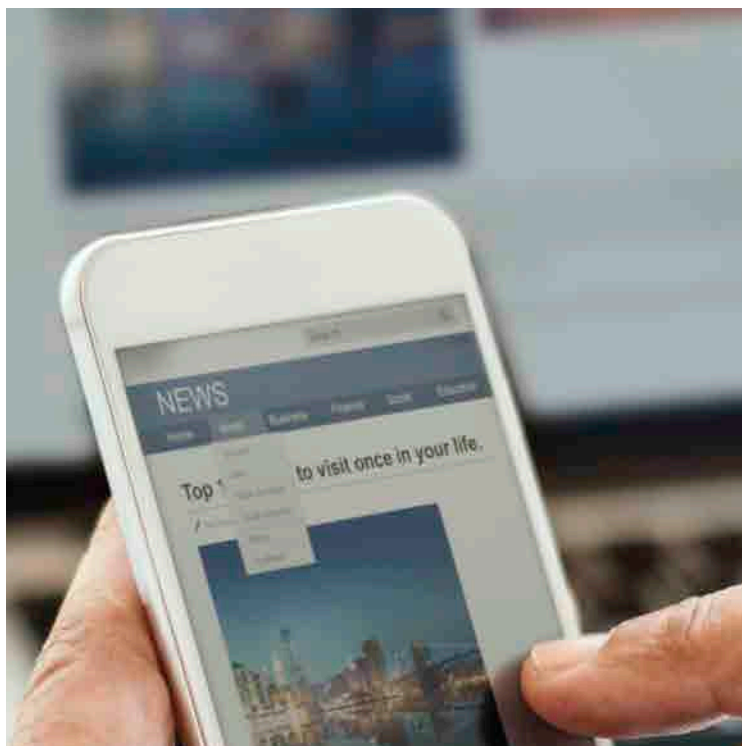
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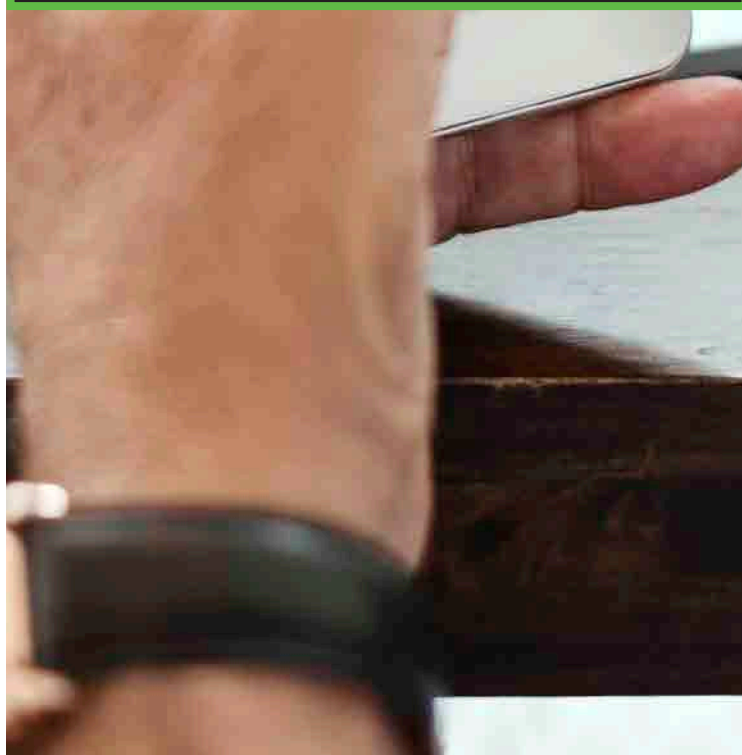
Prominent Case History

JND is routinely called upon to handle the largest and most complex class action administrations. Some of the matters JND and its Founders have worked on over the years include the following:

- Allagas v. BP Solar Int'l, Inc.
- Auction Houses Antitrust Litigation
- BP Deepwater Horizon Settlement
- BP Solar International, Inc. Settlement
- Cecil v. BP America Production Company
- Chieftain-Marathon Oil Company Settlement
- City of Long Beach Telephone Tax Settlement
- ComScore Securities Litigation
- Condé Nast Privacy Litigation
- County of Los Angeles Telephone Tax Settlement
- Dole Food Company Securities Litigation
- Expedia Hotel Taxes & Fees Litigation
- Freedom Financial Network Restitution Program
- Greyhound Lines, Inc. ADA Settlement
- Halliburton EPJ Fund Securities Litigation
- Hearst Communications, Inc. Privacy Litigation
- In re Broiler Chicken Antitrust Litigation
- In re J.P. Morgan Stable Value Fund ERISA Litigation
- In re LIBOR-Based Financial Instruments Antitrust Litigation
- In re Yahoo! Inc. Securities Settlement
- Intuit Data Breach Litigation
- IPO Securities Litigation
- J. Crew Factory Store Pricing Litigation
- Langan v. Johnson & Johnson Consumer Companies, Inc.
- Linneman, et al., v. Vita-Mix Corp., et al.
- Red Bull False Advertising Litigation
- Robert Briseno et al. v. Conagra Foods, Inc.
- Stericycle, Inc. Securities Litigation
- TCF National Bank Restitution Program
- TJX Companies False Pricing Settlement
- Uber Technologies Employment Discrimination Settlement
- Visa/Mastercard Antitrust Litigation
- Vitamix Blender Settlement
- Worldcom Securities Litigation



Class Action





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Prominent Case History

JND's stand-alone securities group has handled dozens of matters in the last year alone. Our team, which is located in New York, is overseen by Co-Founder Neil Zola, with over 25-years' experience in securities class action litigation and administration. Neil has played a direct role in many of the largest securities settlements in our country's history. Among the matters handled by JND and its principles include:

- Akorn Securities Litigation
- Bank of America Securities Litigation
- Bankrate Securities Litigation
- Citigroup Securities Litigation
- ComScore Securities Litigation
- Dole Food Company Securities Litigation
- Endurance Securities Litigation
- GoPro Shareholder Litigation
- Halliburton EPJ Fund Securities Litigation
- Higher One Holdings Securities Litigation
- IPO Securities Litigation
- Nortel Networks Securities Litigation I & II
- Opus Bank Securities Litigation
- Royal Ahold Securities and Erisa Litigation
- Terraform Power Securities Litigation
- Tyco International LTD Securities Litigation
- Washington Mutual Securities Litigation
- Wells Fargo RMBS Trustee Litigation
- Worldcom Inc. Securities Litigation
- Yahoo Securities Litigation



Securities Experience

